

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

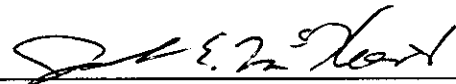
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FOLLOW-UP INTERROGATORY OF UNITED
PARCEL SERVICE TO UNITED STATES POSTAL
SERVICE WITNESS PAFFORD
(UPS/USPS-T4-15)
(April 11, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby
serves this follow-up interrogatory directed to United States Postal Service witness
Pafford: UPS/USPS-T4-15.

Respectfully submitted,



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Of Counsel.

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS PAFFORD

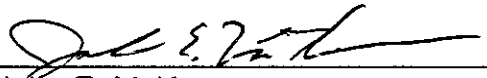
UPS/USPS-T4-15. Refer to Library Reference USPS-LR-I-275, the Postal Service's Cost and Revenue Analysis for Fiscal Year 1999.

(a) Confirm that the parcel post revenue estimate of \$1,020.9 million and the parcel post volume estimate of approximately 319 million pieces are based on combined DRPW and BRPW (and other source data, if any) estimates. If not confirmed, explain.

(b) Provide estimates of total parcel post revenue and pieces for Fiscal Year 1999 based solely on the DRPW sampling system, as was done by the Postal Service before it changed its method of estimating parcel post revenue, pieces, and weight to the combined DRPW and BRPW approach presented by you and Mr. Hunter.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



John E. McKeever
Attorney for United Parcel Service

Dated: April 11, 2000
Philadelphia, Pa.